

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGOANS FOR AN END TO THE
GANG DATABASE, et. al.,

Plaintiffs,

v.

CITY OF CHICAGO, et. al.,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Case No. 18-CV-4242

Hon. Andrea R. Wood

STIPULATION

NOW COME the Plaintiffs and the Defendants, through their undersigned counsel, and hereby stipulate and agree as follows:

1. On June 19, 2018, and contemporaneously with the complaint, the Plaintiffs filed a motion for class certification on behalf of a putative class defined as all persons who currently are or in the future will be included in the Chicago Police Department's Gang Database. *See* Dkt. 5.
2. In that motion, the Plaintiffs requested class discovery and an evidentiary hearing related to class certification. *Id.*
3. Discovery has not yet begun and the Defendants intend to file a motion to dismiss on September 14, 2018. Given this procedural posture, the Plaintiffs voluntarily withdraw their motion for class certification without prejudice and with leave to refile at the conclusion of class discovery.
4. The parties jointly stipulate that when Plaintiffs refile their motion for class certification, the motion will be treated as if it were pending since the original date of filing, June

19, 2018. The Defendants expressly reserve all other rights, arguments, and objections related to Plaintiffs' motion for class certification.

AGREED:

/s/ Vanessa del Valle
Counsel for the Plaintiffs

/s/ Andrew Worseck
Counsel for the Defendants

Sheila A. Bedi
Vanessa del Valle
MacArthur Justice Center
Northwestern Pritzker School of Law
375 E. Chicago Avenue
Chicago, IL 60611
(312) 503-2492

Brendan Shiller
Chris Bergin
Tia Haywood
Shiller Preyar LLC
601 S. California Avenue
Chicago, IL 60612
(312) 226-4590

Elizabeth A. Homsy
The Law Officers of Elizabeth A. Homsy
2506 N. Clark Street
Suite 286
Chicago, IL 60614
(773) 988-3486

Joey L. Mogul
People's Law Office
1180 N. Milwaukee Ave.
Chicago, IL 60622
(773) 235-0070

Counsel for the Plaintiffs and the Plaintiff class

Andrew Worseck
Andrew.Worseck@cityofchicago.org
Tara Kennedy
Tara.Kennedy@cityofchicago.org
Jordan Rosen
Jordan.Rosen@cityofchicago.org
City of Chicago, Department of Law
Constitutional and Commercial Litigation Division
30 North LaSalle Street, Suite 1230

Chicago, Illinois 60602
(312) 744-7129 / 744-9028 / 744-9018

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on August 31, 2018, she caused the foregoing document to be served upon all counsel of record by filing the document using the Court's CMECF system.

/s/ Vanessa del Valle